

**EXHIBIT 38**

**FILED UNDER SEAL**

Dr. J. C. Gage  
Mr. D. J. Rowe

1/29/2

to see and return, please.

Dr. J. C. Calandra  
Director  
Industrial Bio-Test  
Laboratories Inc.  
1810 Frontage Road  
Northbrook, Illinois  
U. S. A.

AABS:EH

12th February 1964

Dear Joe,

Paraquat : Urinary Estimation in Dogs

Thank you for your letter of the 8th February, enclosing the results of paraquat estimations in the urine of dogs on various levels of paraquat in the diet.

In a previous letter from John Kay of the 30th December, there was some suggestion that difficulties had been encountered in estimating paraquat, and he enclosed some notes of results which Fred Kohn of Calchem had obtained. We are quite unable to account for these results here, and I have asked Dr. Gage to write direct to Fred Kohn, with copies of the correspondence to you.

It is of course necessary, in order to avoid any loss of paraquat in the urine, to take steps to inhibit bacterial activity immediately the urine is voided, but I presume that you are already aware of this. It is difficult to understand why dogs on such widely varying paraquat intake (up to ten-fold) should show no difference in the levels of urinary excretion, and I think it would be wise to defer killing the animals until we are satisfied that all doubts on the method of paraquat estimation have been resolved.

Yours sincerely,

A. A. B. Swan